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March 31, 2016

**Via ECF**

Honorable Claire C. Cecchi, U. S. D. J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & US Courthouse  
50 Walnut Street, Room 4015

**Re: Hoffeditz v. AM General, LLC, et al.**  
**Civil Action No.: 2:09-cv-257-CCC-JAD**

Dear Judge Cecchi:

Please accept this brief reply to the letter of March 31, 2016 by counsel to defendant Ford.

No matter how many times defendants try to recast and mischaracterize Dr. Moline's testimony (ascribing to her theories that she did not espouse in her expert report, in her deposition, in her Affidavit, or in her two days of testimony before Your Honor), the truth of the matter is that she articulated and employed essentially the same methodology that Judge D'Agostino held was admissible and satisfied *Daubert* and the Federal Rules. It is telling however, that aside from noting that it is "an unrelated case pending in the Northern District of New York", defendant Ford did not address the *Osterhout* decision at all. Instead, defense counsel attached an excerpt from a 2012 deposition of Dr. Teschke – which it chose not to quote from but rather to mischaracterize – as an argument against what she published in a 2016 "peer reviewed" Letter To The Editor.

We look forward to receiving the Court's decision on the instant motion and moving this case to trial.

Respectfully submitted,



Moshe Maimon

cc: All Counsel of Record – Via ECF